

SD 13/10  
9/11/81

<b>POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT</b> <b>PART 1 - SITE INFORMATION AND ASSESSMENT</b>		<b>I. IDENTIFICATION</b> <small>01 STATE 02 SITE NUMBER</small> <b>IL 4980 898 829</b>	
<b>II. SITE NAME AND LOCATION</b>			
01 SITE NAME (Legal, common, or descriptive name of site) <b>Dupo Oil Co.</b>		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER <b>NE 1/4 of Sect. 34 T-1-S, R-10-W</b>	
03 CITY <b>Sugar Leaf Township</b>		04 STATE <b>IL</b>	05 ZIP CODE <b>62239</b>
06 COUNTY <b>St. Clair</b>		07 COUNTY CODE <b>163</b>	08 CONG. DIST. <b>22</b>
09 COORDINATES LATITUDE <b>38 29 52</b> LONGITUDE <b>090 11 07</b>		Columbia 7.5' Quad (247)	
10 DIRECTIONS TO SITE (Starting from nearest public road) <div style="text-align: center; font-size: 1.2em;">See Attached Map</div>			
<b>III. RESPONSIBLE PARTIES</b>			
01 OWNER (if known) <b>Ferna Hoffman</b>		02 STREET (Business, mailing, residential) <b>R.R. #1</b>	
03 CITY <b>Dupo</b>		04 STATE <b>IL</b>	05 ZIP CODE <b>62239</b>
06 TELEPHONE NUMBER <b>UNK</b>		07 OPERATOR (if known and different from owner) <b>Dupo Oil Co</b>	
08 STREET (Business, mailing, residential) <b>Box 223</b>		09 CITY <b>Dupo</b>	
10 STATE <b>IL</b>		11 ZIP CODE <b>62239</b>	12 TELEPHONE NUMBER <b>UNK</b>
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN			
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input type="checkbox"/> A. RCRA 3001 DATE RECEIVED: _____ MONTH DAY YEAR <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (RCRA 102 (4)) DATE RECEIVED: _____ MONTH DAY YEAR <input checked="" type="checkbox"/> C. NONE			
<b>IV. CHARACTERIZATION OF POTENTIAL HAZARD</b>			
01 ON SITE INSPECTION <input type="checkbox"/> YES    DATE _____ MONTH DAY YEAR <input checked="" type="checkbox"/> NO		02 BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify)	
03 CONTRACTOR NAME(S): _____		04 SITE STATUS (Check one) <input type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input checked="" type="checkbox"/> C. UNKNOWN	
05 YEARS OF OPERATION BEGINNING YEAR _____ ENDING YEAR _____		<input checked="" type="checkbox"/> UNKNOWN	
06 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED <b>Oily Waste (Toxic)</b> <b>Heavy Metals (Soluble/Toxic/Persistent)</b>			
07 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION <b>Ground Water (Population/Environment)</b>			
<b>V. PRIORITY ASSESSMENT</b>			
01 PRIORITY FOR INSPECTION (Check one if high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input checked="" type="checkbox"/> B. MEDIUM (Inspection required) <input type="checkbox"/> C. LOW (Inspect on firm's available basis) <input type="checkbox"/> D. NONE (No further action needed; complete current disposition form)			
<b>VI. INFORMATION AVAILABLE FROM</b>			
01 CONTACT <b>Rich Lange</b>		02 OF (Agency/Organization) <b>IEPA HSCS</b>	
03 TELEPHONE NUMBER <b>(217) 782-6760</b>		04 DATE <b>09 09 85</b> MONTH DAY YEAR	

EPA FORM 2070-12 (7-81)

EPA Region 5 Records Ctr.



311414



I HIGHLY VOLATILE  
J EXPLOSIVE  
K REACTIVE  
L INCOMPATIBLE  
M NOT APPLICABLE

## EPA FORM 2070-12 (7-81)



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
IL	980 898 82

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☒ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED 4,269 04 NARRATIVE DESCRIPTION  
*Highly soluble brine waste placed for disposal in unlined lagoon. This practice has impacted private wells at similar facilities.*

01 ☐ B SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

01 ☐ C CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

01 ☐ D FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

01 ☐ E DIRECT CONTACT 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

01 ☒ F CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☒ POTENTIAL ☐ ALLEGED  
03 AREA POTENTIALLY AFFECTED Unk 04 NARRATIVE DESCRIPTION  
*Loss of production (Ag land) & damage to soil structure has been noted at similar sites.*

*(See J following) (See 05 Other following)*

01 ☒ G DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☒ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED 4,269 04 NARRATIVE DESCRIPTION

*See A above*

01 ☐ H WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 WORKERS POTENTIALLY AFFECTED \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

01 ☐ I POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_ 04 NARRATIVE DESCRIPTION



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

IL 0980 898 829

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☒ J. DAMAGE TO FLORA

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☒ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

The near sterilization of soils (>5 acres), Attributed to increased soil salinity, has been noted at other similar sites.

(See F Above) (See 05 other following)

01 ☐ K. DAMAGE TO FAUNA

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION (include name(s) of species)

01 ☐ L. CONTAMINATION OF FOOD CHAIN

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

(Spills, runoff, standing liquids, leaking drums)

03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_

04 NARRATIVE DESCRIPTION

01 ☐ N. DAMAGE TO OFFSITE PROPERTY

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

01 ☒ P. ILLEGAL/UNAUTHORIZED DUMPING

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

Site was infrequently inspected by regulatory agencies, Facility has now been backfilled making illegal dumping hard to detect.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL OR ALLEGED HAZARDS

Reminding of soils by brines is deemed leading cause of soil erosion in several Il. counties.

III. TOTAL POPULATION POTENTIALLY AFFECTED: 4269

IV. COMMENTS

Dupo Oil Co.  
Address Unreported  
Dupo, IL 62239

Information as appears  
on ERRIS (L-4)

V. SOURCES OF INFORMATION (Cite specific references, e.g. state files, sample analysis, reports)

S.I.A. study

## EXECUTIVE SUMMARY

This site has been placed in the ERRIS data base as a result of its selection for Phase II evaluation during the federally funded Surface Impoundment Assessment (SIA) study of 1980. During ERRIS placement the operator name and business address were utilized from the SIA which results in deviations from ERRIS for actual site location, Part I section II items 02 through 08 of form 2070-12. This use of operator name and address has also led to one (1) ERRIS listing representing, in actuality, from one (1) to one hundred eight (108) actual brine pits at an equal number of separate locations.

Some considerable effort has been expended to select the site with highest, Phase II SIA, pollution potential where multiple sites are represented by a single ERRIS listing. One must keep in mind that the Phase II SIA represents no more than 7 percent of the brine pits identified in Illinois. Phase I identified more than 3200 pits where Phase II evaluated a random selection of less than 220. One must also maintain a realization that phase II pollution potential was determined by bench top study with little or no actual site visitation or monitoring.

Minimal to no file information exists on this site beyond that contained in Phases I and II of the SIA. There is no direct evidence of hazardous waste disposal at this site beyond the potentially hazardous constituents of Illinois Basin brines, but with only annual inspections by Illinois Mines and Minerals staff relevant to oil production practices and recent backfilling of most brine pits in Illinois, disposal of off site material of unknown nature is possible. A literature review and laboratory analysis of samples from two other sites indicate concern for contamination of groundwater/surface water by Sodium, Sulfate, Chloride etc. (Non-Hazardous Constituents), concern for heavy metals (i.e., Chrome, Vanadium, Barium) and long chain hydrocarbons.

A question arises as to the addressability of the heavy metals by CERCLA when one considers 40 CFR section 300.6 "Definitions - Federally Permitted Release (i)" and Section 101(10) of CERCLA. The statement "and which are reinjected" seems to allow CERCLA action, but interpretation and clarification by USEPA legal staff seems required. The long chain hydrocarbons would appear to be included in the exclusion given to crude oil and fractions thereof under 40 CFR section 300.6 "Definitions-Hazardous Substance" and 101(14) of CERCLA.

A medium priority has been assigned due to the potential impact of this site on groundwater in a rural area where private wells are generally the sole source for potable water. Similar sites have impacted private wells to a point requiring users to seek alternative sources for drinking water. A site inspection should be scheduled to verify/update owner-operator information and gain more thorough site specific information.

